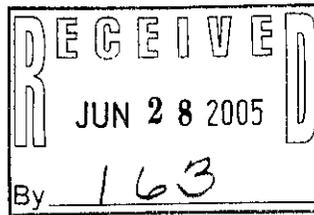




**BENCHMARK
COMMUNITY BANK**

Serving Southside Virginia



Clarksville Office
P O Box 1824 • 133 College Street
Clarksville, Virginia 23927

Phone: (434) 374-9888
FAX (434) 374-9889
www.bconline.net

June 17, 2005

Robert E Feldman
Attention Comments
Federal Deposits Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Dear Mr. Feldman

I would like to express my opposition to the **Proposed Classification of Commercial Credit Exposures.**

The current FAS 114 review already requires that we calculate loss severity for loans rated below the "Pass" category. Our bank currently utilizes six classifications, Pass, Pass – Acceptable with Care, Special Mention, Substandard, Doubtful, and Loss, in our quarterly review of commercial borrowers. Any relationship graded below "Pass" is subjected to a detailed review whereby a specific reserve is established based on that relationship's projected loss amount.

The current system is effective and already accomplishes what this new method proposes. A change will only introduce more confusion and cost into the process with no measurable benefit to the safety and soundness of the bank

Sincerely,

Michael Rowe
Vice President & Senior Loan Officer